

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MICHAEL ALEMAN-VALDIVIA and FREDDY SANCHEZ,
individually and on behalf of all others similarly situated,

Plaintiffs,

Civil Action No.
1:20-cv-00421-LDH-PK

-against-

TOP DOG PLUMBING & HEATING CORP., FIRST CHOICE PL, INC.,
VERONICA AZULAI, and RON MAIMON AZULAI,

Defendants.

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**NOTICE OF PLAINTIFF'S MOTION FOR CONDITIONAL CERTIFICATION AND
COURT-AUTHORIZED NOTICE PURSUANT TO SECTION 216(b) OF THE FLSA
AND EXPEDITED DISCOVERY**

PLEASE TAKE NOTICE that on a date and time to be set by the Court, Plaintiff Michael Aleman-Valdivia will move this Court, before the Honorable Peggy Kuo, United States Magistrate Judge, at the United States District Court, Eastern District of New York, for an Order granting conditional class certification, court-authorized notice pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b), and expedited discovery, as well as such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff shall rely upon his Notice of Motion, Memorandum of Law in Support of Plaintiff's Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216 (b) of the Fair Labor Standards Act and Expedited Discovery, the Declaration of Katherine Morales, Esq., the Declaration of Michael Aleman-Valdivia, accompanying exhibits, and Proposed Order.

Dated: New York, New York
February 26, 2021

Respectfully submitted,

KATZ MELINGER PLLC

/s/ Katherine Morales

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